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January 15, 2020

VIA ECF

Hon. Frederic Block
United States District Judge
United States District Court, EDNY
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Barca, et al.
Defendant George Campos
Indictment # 19 CR 575(FB)

Dear Judge Block;

I represent the defendant George Campos in the above noted matter. Mr. Campos is at liberty on bond, and one of the conditions of his release is that he have no contact with co-defendants, including his son Andrew Campos, except in the presence of counsel. I write to respectfully request a modification of his bond conditions, and I join in the application of Andrew Campos for similar relief, see ECF Document # 131.

As Mr. Mazurek notes, Andrew Campos is on house arrest, and his children, my client's grandchildren, reside with him. Thus, the restriction on the two being in each other's presence impacts severely on my client's ability to maintain relationships with his grandchildren, who have no part in whatever allegations the Government makes against Andrew or George.

The Government opposes the applications of both Andrew and George (see ECF # 133) in a filing which assumes that both will immediately violate the conditions imposed, including by "continu[ing] to obstruct the instant case and ongoing investigation." This assumption is unsupported, and the Government has not demonstrated, except by rhetoric, that there it has any basis. Both Andrew and George are aware of the consequences of violating their bail conditions, and as the Court has already seen fit to release them, they should be trusted to comply unless there is evidence that they have not done so.

My client wishes only to maintain his family relationships, with his son and grandchildren. He understands that any discussion of the case issues,

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without counsel present, is a violation of his conditions of release and that he can expect to be detained if he engages in such conduct. Furthermore, the Government's assertion that he will "pass messages...to other members of the Gambino crime family" has no evidentiary support. Any such conduct would result in George Campos being detained for the balance of the case, whether or not Andrew was involved, and my client will not risk that.

The Government claims that contact with his grandchildren can be maintained through the intercession of other family members, but this Court has no jurisdiction over such people, and no right to infringe on their ability to live their lives by essentially forcing them to conform to my client's schedule.

It is important that my client, 72 years old and not in the best of health, has the ability to be with and enjoy his grandchildren. He will abide by any conditions the Court sees fit to impose in order to accomplish that end, including requiring other family members to be present. For all these reasons, I respectfully request that the Court grant the motion and modify the conditions of bond.

Thank you for your courtesy and consideration.

Respectfully yours,

JOHN S. WALLENSTEIN

JSW/hs

cc: All counsel (by ECF)